

MARTIN A. SCHAINBAUM (CSBN 37257)
BRYANT W.H. SMITH (CSBN 250035)
351 California Street, Suite 800
San Francisco, CA 94104-2406
Telephone: (415) 777-1040
Fax: (415) 981-1065
Email: schainbm@taxwarrior.com

Attorneys for Respondents

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA and
DEIDRE GARRISON, Revenue Officer,

Petitioner,

v.

RONALD P. GOLDMAN,

Respondent.

Case No.: CV 09-0313 WDB

JOINT STIPULATION TO CONTINUE
ENFORCEMENT PROCEEDING AND
~~PROPOSED~~ ORDER

UNITED STATES OF AMERICA and
DEIDRE GARRISON, Revenue Officer,

Petitioner,

v.

JANNA W. GOLDMAN,

Respondent.

Case No.: CV 09-0312 WDB

JOINT STIPULATION TO CONTINUE
ENFORCEMENT PROCEEDING AND
~~PROPOSED~~ ORDER

This matter came before this Court on April 29, 2009, on the Order to Show Cause,
Respondents' Motion to Dismiss, and Petitioners' Motion to Compel Compliance with
Summonses. This Court took these matters under submission and will issue a written order.

1 The Internal Revenue Service and Respondents are involved in Tax Court litigation,
 2 represented by docket numbers 15919-08 and 3703-09. The IRS and Respondents have reached
 3 a tentative settlement in the Tax Court litigation which they anticipate will moot the issues raised
 4 in these summons enforcement proceedings. However, the parties need additional time to agree
 5 upon settlement computations necessary to enter a Decision by the Tax Court. The parties
 6 anticipate that the Tax Court settlement can be consummated on or before July 13, 2009. The
 7 parties anticipate dismissing these summons enforcement proceedings in the event that the Tax
 8 Court case is settled. In the interest of judicial economy, the parties request that this Court
 9 continue this matter to July 13, 2009, in order to allow the parties to consummate the settlement
 10 and dismiss these proceedings.
 11

12
 13 It is hereby agreed and stipulated by the parties in the above-captioned cases, by and
 14 through their respective counsel, and subject to the Court's approval, that this matter be
 15 continued to July 13, 2009.

16 Date: June 5, 2009

17
 18 JOSEPH P. RUSSONIELLO
 19 United States Attorney

MARTIN A. SCHAINBAUM
 A Professional Law Corporation

20 By /s/ Cynthia L. Stier
 21 CYNTHIA L. STIER
 22 Assistant United States Attorney
 Tax Division

By /s/ Martin A. Schainbaum
 MARTIN A. SCHAINBAUM

23 Attorney for Petitioner

Attorneys for Respondents

Pursuant to the above representations and stipulation, it is hereby

ORDERED that the proceedings in this matter are continued to July 13, 2009.

Dated: June 8, 2009 at Oakland, California

